

Management System: Safety and Health

Subject Area: Packaging & Transportation Safety

Procedure 2: Obtaining and Using Special Permits and Obtaining a Certification of Compliance (CoC) Packaging Approval from the Department of Energy (DOE)

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Lead Subject Matter Expert:
Tim Marcus

Management System Owner:
John Sattler

1.0 Applicability

This procedure applies to Environmental Management Consolidated Business Center (EMCBC) supported Small Sites that ship radiological and hazardous materials and waste from the respective sites/projects. It applies to designated Packaging and Transportation (P&T) Safety Staff responsible for ensuring compliance with [DOE O 460.1C](#), *Packaging and Transportation Safety*, as it relates to obtaining special permits, and Certificate of Compliance (CoC) packaging approvals from U.S. Department of Energy (DOE). The DOE Packaging Certification Program (PCP) Certification Process Flowchart is provided at the link below. http://rampac.energy.gov/DOE-Requirements/Packaging_Flowchart.pdf

2.0 Required Procedure

Step 1	Working in coordination with site contractors, Federal Site (P&T Staff or EMCBC Safety & Quality Division staff if no Project Staff is available) identifies a need to obtain a special permit or packaging approval.
Step 2	Site/Project P&T Staff, as necessary follows: <ul style="list-style-type: none">• If a new special permit request is needed, go to Step 3.• If an expiring Special Permit (SP) is required, go to Step 4• If a Certificate of Compliance (CoC) is needed, go to Step 5.
Step 3	Site/Project P&T staff, working with Safety & Quality Division as necessary ensure <ul style="list-style-type: none">• The special permit request meets all the requirements in 49 CFR 107.105.• Notifies the DOE Packaging Certification Program of the need to submit the special permit request to the DOE HQ Certifying Official (HCO) (EM-33) for processing at

	<p>least 150 calendar days prior to when the Program/Project will need the special permit.</p> <ul style="list-style-type: none"> • DOE P&T Staff confer with DOE PCP staff on; <ul style="list-style-type: none"> ○ What are the package contents to be shipped? ○ What is the new package design concept? ○ What modifications to packaging are necessary to renew certification? • Submit requests for new permits to EM-33 for processing to Department of Transportation (DOT). • Site/Project P&T Staff maintain a copy of the Special Permit until it expires or is no longer used for shipping. <p>NOTE: Additional instruction for special permits is available on the RAMPAC (Radioactive Material Packaging) Web site</p>
Step 4	<p>In coordination with small site/project contractors, Site/Project DOE P&T staff:</p> <ul style="list-style-type: none"> • Request timely renewal of an existing Special Permit, if needed, at least 90 calendar days before expiration. • Submit requests for renewals to EM-33 for processing to DOT. • Site/Project P&T Staff maintain a copy of the SP until it expires or is no longer used for shipping.
Step 5	<p>When the Small Site/Project Staff identify a need for a CoC, the EM Site Office or EMCBC P&T Staff work with the Program/Project to either:</p> <ul style="list-style-type: none"> • Register with EM-30 as a user on an existing approval, or • Obtain a new approval. • Site/Project Office P&T Staff coordinate with Subject Matter Experts (SMEs), as needed. <p>NOTE: Additional instruction for using and obtaining a CoC is found on the RAMPAC Web site.</p>
Step 6	<p>DOE PCP reviews qualifications, education and training of Safety Analysis Report for Packaging (SARP) Writing Team (SWT). If necessary, SWT obtains training.</p>
Step 7	<p>Applicant (contractor) begins development of the SARP. At the 25% level of completion, SRT confers with DOE Project P&T & DOE PCP to discuss issues and potential problems.</p> <p>NOTE: Additional instruction on registering a SARP preparation and submittal to EM-33 is available on the RAMPAC Web site.</p>
Step 8	<p>Applicant completes SARP and submits the SARP Completeness Checklist to the site/project field element manager (FEM) for review and concurrence. FEM submits SARP, Checklist & Certification through EM-1 to Headquarters Certifying Official (HCO).</p>
Step 9	<p>DOE PCP completes review. If incomplete, return to applicant. If complete, develop a SARP Review Plan and posts to RAMPAC website.</p>

Step 10	If questions arise, transmit questions to applicant. When SARP is complete and accepted by DOE PCP, SARP Review Team (SRT) prepares a Technical Review Report to the HCO.
Step 11	DOE PCP prepares a Safety Evaluation Report and Certificate of Compliance.
Step 12	HCO approves and issues the Certificate of Compliance.
Step 13	Small Site/Project P&T Staff and DOE PCP maintain copies of active CoCs and SARP used by EM Projects/contractors until they either expire or are no longer being used.
Step 14	Small Site/Projects P&T Staff: <ul style="list-style-type: none"> • Request timely renewal at least calendar 90 days before expiration of the CoC. • Submit requests for renewals to EM-30 for processing.
Step 15	When Small Site/Project P&T Staff identify a need to use an existing packaging approval from DOE or Nuclear Regulatory Commission (NRC); the DOE P&T Staff work with the DOE PEP to: <ul style="list-style-type: none"> • Register to use an existing CoC; or • Site/Project Office P&T Staff coordinate with EMCBC Safety & Quality Division SMEs, as needed. • Request timely renewal, if needed, at least calendar 90 days before expiration of the CoC to EM-33.
Step 16	Site/Project P&T Staff maintain record copies of active Special Permits, packaging CoC and SARPs. NOTE: Alternatively, the DOE Site Project P&T Staff can rely on the contractor to maintain record copies of the applicable documents.
Step 17	File records developed as a result of implementing this Procedure in accordance with Section 4 below.

3.0 References

- [49 CFR 107.105](#), Pipeline and Hazardous Materials Safety Administration, Application for Special Permit.
- [49 CFR 100-185](#), Pipeline and Hazardous Materials Regulations
- [DOE O 460.1C](#), Packaging and Transportation Safety
- [RAMPAC \(Radioactive Material Packaging\) Web Site](#),
 - Certificate Retrieval page
 - Safety Evaluation Reports for DOE Certified Packages
 - Requirements for DOE SARPs
 - DOE Packaging Review Guide
 - Guidelines for Qualifications, Education and Training of SARP Writing Team members

- Payment for All DOE SARP Reviews
- SARP Completeness Checklist
- SARP Submittal Guidelines
- DOE Package Certification Program (PCP) Process Flow Chart

4.0 Records Generated

Records generated through implementation of this procedure are identified as follows and are maintained by the Small Site/Project Office in accordance with their File Plan or within the Office of Technical Support & Asset Management in accordance with the EMCBC Organizational File Plan:

Records Category Code	Records Title	Responsible Organization	QA Classification (Lifetime, Non-Permanent or N/A)
ENV 01-	Environmental Record Case Files – Environmental Program Support Files – Special Permits, CoC's, etc.	Small Site/Project or Office of Technical Support & Asset Management	Non-Permanent